

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE AMERICAN INTERNATIONAL
GROUP, INC. ERISA LITIGATION II

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Master File No.: 08-CV-5722 (LTS) (DCF)

This Document Relates To:

All Actions

**NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, APPROVAL OF
NOTICES OF SETTLEMENT, APPROVAL OF
THE PLAN OF ALLOCATION, AND SETTING OF FAIRNESS HEARING**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Joint Declaration of Interim Co-Lead Plaintiffs' Counsel, Plaintiffs hereby move the Court, before the Honorable Laura Taylor Swain, United States District Court Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12-D, New York, New York, for entry of an Order: (a) granting preliminary approval of the Settlement¹; (b) conditionally certifying the proposed Settlement Class pursuant to Fed. R. Civ. P. 23(b)(1); (c) approving the forms for the mailing and publication of the notice of Settlement; (d) granting preliminary approval of the proposed Plan of Allocation; and (e) setting a date and time for the Fairness Hearing with respect to the Settlement and related deadlines as set forth in the proposed preliminary approval order ("Preliminary Approval Order"), attached as Exhibit 1 to the Class Action Settlement Agreement ("Settlement Agreement"), dated April 22, 2015, filed herewith. This motion is made unopposed.

WHEREFORE, for the reasons stated and such other reasons as may appear to the Court, Plaintiffs respectfully request that the Court grant the instant unopposed motion.

¹ Except as indicated, the capitalized terms used herein shall have the meanings ascribed to them in the Settlement Agreement filed herewith.

Respectfully submitted this 23rd day of April, 2015.



Robert I. Harwood
Tanya Korkhov
HARWOOD FEFFER LLP
488 Madison Avenue
New York, NY 10022
Telephone: (212) 935-7400
Facsimile: (212) 753-3630
Interim Co-Lead Counsel



Marian P. Rosner
Andrew E. Lencyk
WOLF POPPER LLP
845 Third Avenue
New York, NY 10022
Telephone: (212) 759-4600
Facsimile: (212) 486-2093
Interim Co-Lead Counsel



Lee Squitieri
SQUITIERI & FEARON LLP
32 East 57th Street, 12th Floor
New York, NY 10022
Telephone: (212) 421-6492
Facsimile: (212) 421-6553
Interim Co-Lead Counsel



Lynn Lincoln Sarko
Erin M. Riley
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Telephone: (206) 623-1900
Facsimile: (206) 623-3384
Interim Co-Lead Counsel

CERTIFICATE OF SERVICE

I certify that, on April 23, 2015, I electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system which will send a notification to all counsel of record.

/s/ Robert I. Harwood
Robert I. Harwood